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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Broadcast Services; Advanced Television }
Systems: Fourth Further Notice of Proposed } MM Docket No. 87-268; FCC 95-315
Rule Making and Third Notice of Inquiry }

INTERNATIONAL BROADCASTING NETWORK'S COMMENTS

I. Introduction

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International Broadcasting Network (IBN), a nonprofit corporation which owns and operates nine low power television stations and is currently building a tenth, hereby submits its comments in the above-referenced proceeding.

II. Impact Upon the Public

Implementation of the present proposals concerning Advanced Television (ATV) would have an unreasonably adverse impact upon the public. American consumers have invested billions of dollars in NTSC television receivers, VCRs and related equipment and supplies. Government-mandated obsolescence of existing equipment would serve no legitimate purpose, would be contrary to the public interest and would inevitably arouse massive public opposition. Large numbers of consumers would find it financially burdensome to discard their existing equipment and invest in new ATV receivers. Minorities, elderly persons, those who are economically disadvantaged, middle-class Americans, residents of rural areas and residents of inner cities would be most severely harmed by the loss of NTSC service. Even the wealthiest consumers would view federally-imposed conversion to ATV as unwarranted governmental intrusion restricting their freedom of choice.

III. Impact Upon Broadcasters

Mandatory conversion to ATV would have an unreasonably adverse impact upon broadcasters. The impact would be devastating to broadcasters not having the necessary financial resources to convert to ATV. Small entities, minority-controlled entities, nonprofit entities, owners of independent stations, owners of stations located in rural areas, owners of stations in

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economically-depressed areas and owners of low power television stations would face the loss of their stations. Television broadcasting would become the exclusive domain of a few large entities having the necessary financial muscle to control the industry. Diversity of ownership and viewpoint would be lost along with the hopes and dreams of hundreds of broadcasters who are presently serving the public interest. Such a fate would be unconscionable.

IV. Impact Upon the Economy

Compulsory conversion to ATV would be highly detrimental to our national economy. Many billions of dollars would be required to successfully implement the conversion, and much of that would go to manufacturers located in Japan, Korea, Malaysia, Singapore, China and other foreign nations. The trade deficit would substantially worsen. The strength of the dollar against foreign currencies would plummet. The massive spending required for ATV would drain resources that might otherwise be spent on American-made products and services. Unemployment would rise, and every area of the national economy would suffer. Financing would become much harder to obtain, and interest rates would rise. Many stations would be forced into bankruptcy. Personal savings would decrease, and consumer debt would reach unacceptable levels. The economic implications are enormous, and they are quite unfavorable. The cost of implementing the ATV proposals as they now stand would be much too burdensome for consumers and broadcasters alike. Our nation cannot afford to jump blindly into the destruction of its existing NTSC television service and impose by force of law a different technology posing serious threats to the national economy.

V. A Better Way

Mandatory conversion to ATV is not in the public interest and will cause great harm to consumers, broadcasters and the national economy. Such a sweeping change in the mass media is unprecedented and poses unacceptable risks and known dangers. Never before has a broadcasting service been targeted for extinction as the NTSC television service now is. If the Commission feels compelled to promote ATV, that can be done in a reasonable and prudent manner without destroying the existing NTSC television system. Just as FM radio developed alongside AM radio, ATV should be allowed to develop alongside the existing NTSC service. The Commission did not force AM radio stations to convert to FM. Rather, the Commission set the standards for the new FM service and allowed market forces to operate. It has been 55 years since the Commission granted the first construction permits for FM radio stations, and the service has thrived. AM radio and FM radio have coexisted for more than half a century, and both services continue to serve the public interest in an exemplary manner. In the same way, the

Commission should establish the standards for ATV and allow market forces to operate. There is no necessity for the federal government to impose ATV and deprive consumers and broadcasters of a choice. In a free market economy, market forces should be allowed to operate. Above all, a system that is working and serving the public well should not be abandoned. The NTSC television system, including the nation's 1,648 low power television stations as well as the nation's 1,539 full power stations and 4,770 translator stations, has much to offer, and it should not be forced out of existence by legislative or regulatory fiat.

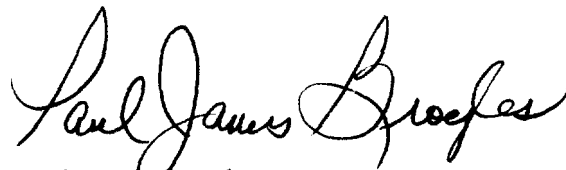
VI. Conclusion

IBN respectfully submits that the ATV proposals as they currently stand are inappropriate and, if implemented, will have disastrous consequences for consumers, broadcasters and the nation's economy. The proposals for mandatory imposition of ATV should be rejected as being contrary to the public interest and destructive of the American system of universal, free, over-the-air television. If ATV is considered feasible and in the public interest, standards should be established and it should be allowed to develop alongside, but not in replacement of, the existing NTSC television system in the same manner that FM radio was allowed to develop alongside AM radio. Moreover, no proposal that excludes, deals unfairly with or endangers the nation's 1,648 low power television stations should be adopted.

Respectfully submitted,

INTERNATIONAL BROADCASTING NETWORK

By its President

A handwritten signature in black ink, reading "Paul James Broyles". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul James Broyles

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